Remarks:

Applicants (hereinafter, Applicant) hereby request reconsideration of the application.

Claims 1-6 and 9-12 remain in the application.

In item 1 on page 2 of the Office action, claims 1-6 and 9-12 have been rejected as being fully anticipated by Schmersel et al. (U.S. Pat. No. 6,055,302) (hereinafter, Schmersel) under 35 U.S.C. § 102.

As will be explained below, it is believed that the claims were patentable over this cited art in their original form and the claims have, therefore, not been amended to overcome the reference.

Before discussing the prior art in detail, it is believed that a brief review of the invention as claimed, would be helpful.

Claim 1 calls for, inter alia, a method for implementing telecommunication services in a telecommunications network, which comprises the steps of:

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initiating a telecommunication service due to an event which *differs* from a connection setting-up request from a subscriber;

generating a virtual telephone number via the telecommunication service after activating the telecommunication service;

signaling the virtual telephone number to a service provider, the service provider in turn indicating an occurrence of the event;

using a switching point to transmit the virtual telephone number from the service provider to initiate the telecommunication service after the occurrence of the event; and

carrying out actions defined for the telecommunication service. (Emphasis added.)

Accordingly, the *present invention* is directed to a method for initiating a telecommunication service, which is independent of a call being set up after initiation by a service user. The application protocol (the IN Service Logic) is initiated by an external trigger, or else a virtual trigger.

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The **Schmersel** reference discloses a system and method for
conforming the service profiles for non-call-related store-
and-forward messages to those applicable to calls in an
Intelligent Network (IN) telecommunications system containing
several Intelligent Peripherals (IPs) connected to a Service
Control Point (SCP) over a network.

When an IP that handles outgoing calls and messages receives
an outgoing message or when an IP, handling incoming calls, is
queried by a subscriber, the IP interrogates the SCP to
determine whether any IN services such as restriction control
and number translation have been requested, selected or
imposed by the sending or the receiving parties. The SCP
acknowledges the interrogation and returns the generated
results to the IP for further processing, optionally, by
retrieving and analyzing a service script corresponding to
either the originating or the terminating party.

In other words, Schmersel discloses the call structure in an
IN network standardized according to Q.1201, (which is already
known, as mentioned by the Examiner). See col. 8, line 59 to
col. 9, line 4; col. 9, lines 28 to 36; Fig. 2.

However, claim 1 recites the element <u>virtual telephone number</u>.
For more explanation, see page 6, lines 6++ of the

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specification of the instant application. When the desired service is activated, the virtual telephone number is generated, and the telephone number is converted in the SCP as soon as this telephone number is dialed. This **differs** from a normal "call forward" in that several subscribers can be registered under this virtual telephone number; thus, this is not a 1:1, but a 1:n, conversion. Furthermore, a common connection setup is not triggered with this virtual telephone number, but actions of any type can be triggered (i.e., the transmittal of a text message or the like).

Additionally, the initiation of the service is by an element, which is entirely different from the connection setup. In the illustrated case of the *present invention*, this is a flight information service, where the initiating element is the delay of a flight.

With regard to col. 4, lines 32-49 of Schmersel, Applicant points out that it just contains a general description of an Intelligent Network (IN). With regard to Col. 4, line 65 to Col. 5, line5 of Schmersel, Applicant submits that the terms "corporate telephone network", "investment" and "avoid the costs" are not technical state of the art, and are not even suggested to be.

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With regard to col. 5, lines 39-49 of <u>Schmersel</u>, Applicant points out that it just discusses call routing and call restrictions, but not virtual numbers for an IN-based service. Referring to cols. 8-9, lines 59-4, in particular to line 3, col. 9, Applicant submits that the SCP instructs the SSP to carry out the necessary action rather than informing the *transmitter*.

Moreover, in col. 9, lines 23-36, the term "transmit the virtual telephone number from the service provider" (i.e., transmitting the result being awaited) cannot be found.

Applicant further points out that col. 17, lines 25-37 of <u>Schmersel</u> do not make up for the deficiencies either.

Accordingly, Applicant submits that the first cited passage describes only common IN functionality. Only the last cited passage does describe that, in the virtual private network (VPN), only the "extension number" must be dialed (i.e., only the last part of the national destination number + VPN number + extension number).

Applicant further points out that according to claim 1, in one instance of an IN service (in its entirety), a virtual number is temporarily assigned, which *differs* from and has no relationship to an "extension" (i.e., a main line), neither

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physically nor logically. Further, the service can serve one or *several* communication subscribers.

Clearly, the reference does not show "a method for implementing telecommunication services in a telecommunications network, which comprises the steps of "initiating a telecommunication service due to an event which *differs* from a connection setting-up request from a subscriber; *generating a virtual telephone number via the telecommunication service after activating the telecommunication service; signaling the virtual telephone number to a service provider, the service provider in turn indicating an occurrence of the event; using a switching point to transmit the virtual telephone number from the service provider to initiate the telecommunication service after the occurrence of the event; and carrying out actions defined for the telecommunication service"*, as recited in claim 1 of the instant application (emphasis added). Thus, neither can the specific combination of the aforementioned limitations be shown. Claims 11-12 recite similar limitations.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either show or suggest the features of claims 1, 11 or 12. Claims 1, 11 & 12 are, therefore, believed to be patentable over the art

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and since all of the dependent claims are ultimately dependent on claim 1, they are believed to be patentable as well.

In view of the foregoing, reconsideration and allowance of claims 1-6 and 9-12 are solicited.

In the event the Examiner should still find any of the claims to be unpatentable, the Examiner is respectfully requested to telephone counsel so that, if possible, patentable language can be worked out.

Please charge any fees which might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner and Greenberg, P.A., No. 12-1099.

Respectfully submitted,

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For Applicant

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